

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
BridgeWave Communications, Inc.,)	WT Docket No. 11-25
Request for Waiver of Section 101.147(r))	
to Permit Channel Aggregation by Non-MVPD)	
Users of the 18 GHz Band)	

COMMENTS OF FIBERTOWER CORPORATION

FiberTower Corporation (“FiberTower”)¹ files these Comments on the above-captioned waiver request. BridgeWave Communications, Inc. (“BridgeWave”) seeks a waiver of Section 101.147(r) of the Commission’s Rules to authorize its users to aggregate contiguous channels in the 17.7-19.7 GHz band for operation over a single carrier.²

As the Commission has frequently observed (e.g., in the National Broadband Plan, among other Matters), the need for backhaul is critical to the deployment of wireless broadband and other wireless services.³ In addition, as “[m]any wireless providers increasingly rely on microwave for backhaul, especially in rural areas... the FCC should take steps to ensure that sufficient microwave spectrum is available to meet current and future demand for wireless

¹ FiberTower: possesses over 14,000 fiber optic miles; enjoys access to over 100,000 towers and buildings through Master Licensing Agreements with the largest tower companies in the U.S.; has an extensive national-scope spectrum footprint in the 24 GHz and 39 GHz bands; holds approximately 3,000 point-to-point licenses in the common carrier bands (11 GHz, 18 GHz, 23 GHz); operates its hybrid carrier-class microwave and fiber networks in 13 major markets; has customer commitments from nine of the leading commercial mobile carriers; holds partnerships with leading government contractors and, is a GSA Schedule 70 holder. For more information, please visit our website at <http://www.fibertower.com>.

² In the Matter of BridgeWave Communications Inc. Request for Waiver of Section 101.147(r) to Permit Channel Aggregation by Non-MVPD Users of the 18 GHz Band, *BridgeWave Request for Waiver*, WT Docket No. 11-25 (filed May 12, 2010)(“BridgeWave Petition”).

³ See “Connecting America: The National Broadband Plan,” Federal Communications Commission, at Section 5.5 (March 2010).

backhaul...[and] should take further actions to enhance the flexibility and speed with which companies can obtain access to spectrum for use as wireless backhaul.”⁴ The FCC has consistently affirmed the need to ensure that wireless backhaul will be a viable and cost-effective option for meeting increased demand for backhaul services.⁵

Providing for the more flexible use of microwave frequencies for backhaul, furthermore, “may help promote access to backhaul solutions that are critical to the deployment of wireless broadband and other services... [m]oreover, microwave may be the only practical high-capacity backhaul solution available to serve certain rural and remote locations.”⁶

FiberTower applauds BridgeWave’s industrious development of the fixed wireless backhaul equipment in the millimeter wave spectrum; indeed, FiberTower has worked directly with BridgeWave to develop an ultra-high capacity multi-channel reconfigurable radio (“MCRR”) designed to operate in FiberTower’s unique 24 GHz licensed spectrum holdings.⁷ Development of more efficient models offering wireless backhaul solutions at microwave frequencies is only to the benefit of the public as the industry works to provide broadband solutions to underserved and unserved areas in the U.S. BridgeWave notes that aggregation of contiguous 18 GHz channels, operating over a single carrier, allows a carrier to transmit over a single radio at a lower cost, and over a longer link distance, than separating the channels into

⁴ *Id.*

⁵ In the Matter of Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees, *Notice of Proposed Rulemaking and Notice of Inquiry*, at 4, FCC 10-146, WT Docket No. 10-153 (rel. Aug. 5, 2010).

⁶ *Id.* at 1, 3.

⁷ See FiberTower – BridgeWave Press Release, “FiberTower and BridgeWave Communications Develop Gigabit Wireless Solution for 24 GHz” (rel. Feb. 1, 2011), available at <http://www.fibertower.com/corp/news-press-releases.php>. Based on BridgeWave’s FlexPort microwave platform, the MCRR is a single, all-outdoor radio capable of delivering full-duplex gigabit Ethernet transport with very low latency at standard and jumbo packet sizes, while providing advanced carrier-Ethernet features such as Quality of Service, VLAN and Ethernet OAM support. Of course, we recognize 18 GHz operation, even aggregated, does not mimic the design flexibility offered in wide-area licensed spectrum in bands such as 24 GHz, 28 GHz & 31 GHz (LMDS), and 38 GHz.

different links.⁸ FiberTower agrees that to deliver Gigabit capacity, the industry should have the ability to aggregate multiple RF channels. The proposed operation should not create new interference implications for other users in the band, as users are still expected to comply with other Part 101 rules.⁹

For the reasons cited above, FiberTower supports BridgeWave's petition for waiver to allow channel aggregation in the 18 GHz band.

Respectfully submitted,

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⁸ BridgeWave Petition at 3.

⁹ *Id.*